Precedents.—That decisions of to-day are sometimes governed by precedents which appear to have outlived their usefulness is illustrated by the recent decision of the New York Supreme Court in De Wolf *v.* Ford, 104 New York Supplement 876. The court in this case, on authority of an early English case (Calye's Case, 1 Smith's Lead. Cas. [8 Ann. Ed.] 249), held that a guest at a hotel could not recover for insults heaped upon her by a servant of the proprietor of the hotel. In the English case the rule was laid down that an innkeeper's liability extends only to injuries to the movables of his guests. He is not liable for insults or injuries to the person. As the court could not find that this case had ever been questioned in England, it considered itself bound. Judge McLaughlin, however, dissents from the decision of the majority.

Former Jeopardy—Application of "Same Transaction Test."—The case of Fews *v.* State (Ga. Ct. App.), 58 Southeastern Reporter, 64, holds that where defendant was accused of shooting two different persons in rapid succession, who had made no joint attack upon him, two distinct crimes were committed, and that a conviction for one was no bar to a prosecution for the other. A similar question arose in Burnam *v.* State, Id. 683, where the state court, after setting out a hypothetical case, applied the same principle.

Change of Domicile May Be Enjoined.—The laws of Georgia provide that when an incorporated town or city is divided by a county boundary an election may be held to have it included by one of the counties. Roswell had been established by legislative enactment within a single county. An action was instituted by plaintiff to prevent a change of the county line under the assumption that the municipality extended into an adjoining county. The Georgia Supreme Court says in Town of Roswell *v.* Ezzard, 57 Southeastern Reporter, 114, though a citizen has no vested right to determine in which political division of the state his residence shall remain, yet he may bring an action and settle the whole matter in a single suit, and enjoin the change of his domicile, where it is shown the law has no application.

Dismissal of Writ of Error.—In the case of Nicholson *v.* McGovern Undertaking Co., 92 Pacific Reporter, 225, counsel for appellant, referring to suit brought against another party arising out of the same cause of action as the case at bar, admitted that the action was properly dismissed below. The Supreme Court of Colorado thereupon affirmed the decision, saying that, since the parties are in accord that the decision of the trial court was correct, it would not be fitting to disturb this unusual concord by reversing a judgment with which the parties themselves are satisfied.